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Attorneys for Creditor
Advocate Capital, Inc.

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

LAYFIELD & BARRETT, APC,

Debtor.

Case No. 2:17-bk-19548-NB

Chapter 11

**STIPULATION FOR THE APPOINTMENT
OF A CHAPTER 11 TRUSTEE**

**TO THE HONORABLE NEIL W. BASON, UNITED STATES BANKRUPTCY JUDGE,
THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL OTHER INTERESTED
PARTIES:**

Secured creditor, Advocate Capital, Inc. ("Advocate"), petitioning creditors The Dominguez Firm, Mario Lara, Nayazi Reyes, and Maria Rios (the "Petitioning Creditors"), and Layfield & Barrett, APC (the "Debtor," and together with Advocate and the Petitioning Creditors, the "Parties"), by and through their undersigned counsel, enter into this Stipulation for the Appointment of a Chapter 11 Trustee (the "Stipulation") based upon the foregoing recitals (the "Recitals"):

RECITALS

A. On August 3, 2017, the Petitioning Creditors filed a chapter 7 involuntary petition against the Debtor.

B. That same day, the Petitioning Creditors also filed an emergency motion for the appointment of an interim trustee (the "Emergency Trustee Motion") [Docket No. 3].

1 The Emergency Trustee Motion was denied by order entered on August 11, 2017 [Docket
2 No. 24].

3 C. On August 8, 2017, the Debtor filed a motion to convert the case from one
4 under chapter 7 to one under chapter 11 [Docket No. 19]. The case was converted
5 pursuant to order entered on August 11, 2017 [Docket No. 25].

6 D. The Parties believe that all creditors and the Debtor would be better served
7 by the appointment of a chapter 11 trustee.

8 **STIPULATION**

9 **NOW, THEREFORE**, in consideration of the foregoing Recitals, and subject to
10 Bankruptcy Court approval of the Stipulation, the Parties hereby stipulate and agree to the
11 appointment of a chapter 11 trustee.

12 **IT IS SO STIPULATED.**

13 Dated: August 16th, 2017

LOBEL WEILAND GOLDEN FRIEDMAN LLP

14
15 By: 

JEFFREY I. GOLDEN
Attorneys for Creditor
Advocate Capital, Inc.

16
17
18 Dated: August 16, 2017

HOLLAND & KNIGHT LLP

19
20 By: 

ROBERT LABATE
Attorneys for Petitioning Creditors,
The Dominguez Firm, Mario Lara,
Nayazi Reyes, and Maria Rios

21
22
23 Dated: August _____, 2017

HAVKIN & SHRAGO

24
25 By: _____

STELLA HAVKIN
Attorneys for Debtor
Layfield & Barrett, APC

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16 JEFFREY I. GOLDEN
17 Attorneys for Creditor
Advocate Capital, Inc.

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21 ROBERT LABATE
22 Attorneys for Petitioning Creditors,
The Dominguez Firm, Mario Lara,
Nayazi Reyes, and Maria Rios

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HAVKIN & SHRAGO

24
25 By: _____

26 STELLA HAVKIN
27 Attorneys for Debtor
Layfield & Barrett, APC
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 950, Costa Mesa, California 92626

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION FOR THE APPOINTMENT OF A CHAPTER 7 TRUSTEE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) **August 16, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:**

On (date) **August 16, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) **August 16, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Neil Bason, 255 E. Temple Street, Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 16, 2017
Date

Kelly Adele
Printed Name

/s/ Kelly Adele
Signature

VIA U.S. MAIL

Robert Labate
Holland & Knight LLP
50 California Street, Suite 2800
San Francisco, CA 94111

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